Remarks:

Rejection of Claims under § 102 over Acharya

The Office Action has rejected pending claims 1-24 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,229,578 B1 ("Acharya"). Applicants respectfully traverse this rejection. With respect to claim 1, Acharya does not disclose a method in which "replacing the first portion with a second portion of the video frame" occurs, as recited by claim 1. In this regard, Applicants respectfully disagree that the above-recited element is met by the linear averaging technique disclosed in Acharya (Office Action, p.2). As disclosed in Acharya, such a technique averages neighboring pixels and the pixel under consideration to obtain an average of the pixels. It is then this average of the pixels that replaces the original pixel. (Acharya, col. 11, ln. 29 to col. 13, ln. 3). Thus, claim 1 and claims 2 through 8 depending therefrom patentably distinguish over Acharya.

Dependent claim 6 is further patentable over Acharya, as Acharya does not disclose comparing noise "to a noise level found in a second video frame" as recited by claim 6. Instead, Acharya merely discloses that a gradient value is compared to a threshold value. Nowhere is it disclosed that such threshold value is a noise level found in a second video frame. Accordingly, claim 6 patentably distinguishes over Acharya for this further reason.

Dependent claim 7 is further patentable over Acharya because Acharya does not disclose a threshold value being associated "to the type of video input signal" as recited by claim 7. Nor does Acharya disclose a threshold value being associated "to the type of noise in the video frame" as recited

by dependent claim 8. For these further reasons, dependent claims 7 and 8 further patentably distinguish over Acharya.

For similar reasons as discussed above as to claim 1, claim 9 is patentable over Acharya, as nowhere does Acharya disclose a system having a software program that "replaces the first portion of the video frame with a second portion of the video frame", as recited by amended claim 9. Thus, claim 9 and claims 10 through 15 depending therefrom are patentable over Acharya. Dependent claims 13 and 14 are further patentable for the same reasons discussed above regarding claims 6 and 7, respectively.

As discussed above regarding claim 1, claim 16 and claims 17 through 24 depending therefrom are patentable over Acharya. Further, for the same reasons discussed above regarding claims 6-8, dependent claims 21 and 23-24 patentably distinguish over Acharya.

New claims 25-30 are also patentable over the cited art, as nowhere does the art show "replacing the first portion of the video frame with one of the second portion, the first adjacent portion or the second adjacent portion if a comparison between the first result and the second result is indicative of noise" as recited by new claim 25. Dependent claims 26-30 are patentable because they further limit the independent claim.

In view of the amendment and these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504.

Respectfully submitted,

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APPENDIX

9. (Amended) A system including:

a bus;

a processor coupled to the bus;

a device coupled to the bus to receive a video signal; and

a storage medium coupled to the bus including a software program that, upon execution:

detects noise in a first portion of a video frame of the video signal; and

replaces a first portion of the video frame with a second portion of the video frame.